

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:14CR00246 AGF/NAB
)	
BRIAN CHRISTOPHER HOUNSOM,)	
)	
Defendant.)	

MOTION TO WITHDRAW

COMES NOW Shostak Law, LLC and Burton H. Shostak, and for their Motion to Withdraw as counsel for Defendant Brian Hounsom, state as follows:

Counsel has provided Mr. Hounsom with substantial legal representation and has protected his interest in the above criminal case. The undersigned provided Mr. Hounsom with reasonable notice of his financial obligation, however, he has failed to pay his attorney fees incurred for his defense in this matter, making it impossible for the undersigned counsel to continue to effectively represent him in this action. The continued representation of him under the present circumstances will present an unreasonable financial burden upon counsel.

Although a substantial amount of work has been undertaken to defend Mr. Hounsom in this matter, this case it's not presently set for trial, but it is clear to counsel that it will be set for trial in the near future.

The undersigned counsel has discussed the matter of withdrawal with Defendant and Defendant advised that he has no objections.

WHEREFORE, for the reasons above stated, the undersigned respectfully requests this Court to enter an Order: (a) allowing the undersigned and firm to withdraw as counsel for Mr.

Hounsom; (b) relieving undersigned counsel and firm of any further obligations on behalf of Mr. Hounsom; (c) providing Mr. Hounsom with at least thirty (30) days to retain counsel before any additional deadlines are imposed upon him; (d) directing that all future pleadings, motions, discovery and any all other communications concerning this matter be sent to Mr. Brian Hounsom, 67 Blakchorn, Drive, St. Louis, Missouri 63123 until such time a successor counsel enters an appearance; and (e) for other such relief the Court deems just and proper.

Respectfully submitted.

/s/Burton H. Shostak

Burton H. Shostak, MB# 17443

SHOSTAK LAW, LLC

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Attorney for Defendant Brian Christopher Hounsom

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

And I hereby certify that on 1st day of May, 2015, I mailed by the United States Postal Service, the document(s) to the following non-registered participants:

Mr. Brian Hounsom
67 Blakchorn, Drive
St. Louis, Missouri 63123

/s/Burton H. Shostak